

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Beverly A. Gilchrist

Steven R. Glover, Annie L. Jefferson

Aaron Glover, Terri D. Frazier

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 2014-CP-19-097

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

-against-

Charles L. Reel, Eydie J. Tillman

Jennifer P. Sumner, Odell Glover

Joseph V. Mosley, James A. McLaugh Jr.

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

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2021 AUG -4 PM 12:39

Steven R. Glover Plaintiff Brother

3314 Hwy 19

Trenton, SC 29847
(803) 275-3337 Home
CELL:

Fernie Frazier Plaintiff Sister

3312 Hwy 19

Trenton, SC 29847
(803) 275-3337 Home
(803) 270-1110 CELL

Aaron L. Glover Plaintiff Brother
Saluda SC.

Annie L. Jefferson Plaintiff's
Aunt
Hwy 19 Trenton, SC 29847

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name c/o Beverly H. Gilchrist (C) All Rights Reserved
 Street Address In care of: 132 Samuel E. Diggs Rd.
 City and County Trenton, SC [29847]
 State and Zip Code South Carolina [29847]
 Telephone Number (803) 439-2979

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name Charles L. Reel
 Job or Title Edgefield County "Clerk of Court"
 (if known)
 Street Address P.O. Box
 City and County Edgefield City, Edgefield County
 State and Zip Code South Carolina 29824
 Telephone Number _____

Defendant No. 2

Name Lydie J. Tillman
 Job or Title Attorney (Referee Judge)
 (if known)
 Street Address 205 Lynch Street
 City and County Edgefield "City", Edgefield "County"
 State and Zip Code South Carolina 29824
 Telephone Number _____

Defendant No. 3

Name Jennifer P. Sumner

Odell Glover

2nd Defendant

126 Samuel E. Diggs Rd
Trenton, South Carolina 29847
(803) 275-4650

Job or Title
(if known)

Attorney

Street Address

P.O. Box 502 300 main street

City and County

"City" Edgefield, "County" Edgefield

State and Zip Code

South Carolina 29824

Telephone Number

Defendant No. 4

Name

James A. McLaughlin Jr. & Joseph V. Masley

Job or Title
(if known)

Edgefield County Magistrate Judge's

Street Address

P.O. Box 664

City and County

Edgefield "city" Edgefield "County"

State and Zip Code

South Carolina 29824

Telephone Number

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

"Civil Rights" and liberties violation And "Alleged"
"Fraud" + Damages

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Beverly A. Gilchrist is a citizen of the State of (name) South Carolina.

b. If the plaintiff is a corporation

The plaintiff, (name) Beverly A. Gilchrist is incorporated under the laws of the State of (name) South Carolina, and has its principal place of business in the State of (name) South Carolina.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Charles L. Reel, is a citizen of the State of (name) South Carolina. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Charles L. Reel, is incorporated under the laws of the State of (name) South Carolina, and has its principal place of business in the State of (name) South Carolina. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) South Carolina.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

Eydie J. Tillman Defendant Individual

Citizen: South Caroling

Business: South Caroling

Jennifer P. Sumner Defendant Individual

Citizenship: South Caroling

Business: South Caroling

James A. McLaughlin, Jr. Individual Defendant

Citizenship: South Caroling

Business: South Caroling

Joseph V. Mosley Individual Defendant

Citizenship: South Caroling

Business: South Caroling

Odell Glover Individual Defendant

Citizenship: South Caroling

Business: South Caroling

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$81,500.00 is pendent worth \$58,000.00
was Removed Through By "Fraud" "Alleged"

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

\$58,000.00 is pendent was Remove in which
was protecting my Deeds and Deed of others
\$81,500.00 was said to paid to my self and
other's Hears for purchase of properties with
Grantor, Grantee's permissions written or otherwise
But papers was signed and now said "eviction" 08/05/21

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I've Resided For over 25 years I want
as Grantor, Grantee my 0.97 acres "Clear and
Free" my \$58,000.00 is pendent Cost of legal
and financial losses/Business, \$81,500.00 to
Be Despende among other Hears Interest For
their Suffering and mental angrishes also.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 08/04, 2021.

Signature of Plaintiff

Printed Name of Plaintiff

Bey A. Gilchrist © All Rights Reserved
w/o prejudice
Beverly A. Gilchrist ©

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____